

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

CASE NO.: 23-34815

GALLERIA 2425 OWNER, LLC

CHAPTER 11

Debtor

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

**TO THE CLERK OF THE COURT AND ALL PARTIES IN INTEREST
PLEASE TAKE NOTICE THAT:**

The undersigned is now counsel of record for Sonder USA Inc. in the above-referenced bankruptcy case (Doc. No. 927), and files this Notice of Appearance and Request for Notice in the above-referenced proceeding and requests that all notices given or required to be given in this case and all documents served or required to be served in this case be given or served upon same at the address and/or email address listed as follows:

J. Eric Lockridge
Texas State Bar No. 24013053
eric.lockridge@keanmiller.com
KEAN MILLER LLP
400 Convention Street, Suite 700
P. O. Box 3513 (70821-3513)
Baton Rouge, LA 70802
Telephone: (225) 387-0999
Telecopier: (225) 388-9133

FURTHER NOTICE is hereby given that the foregoing request includes all notices and copies of all motions, notices, reports, briefs, applications, complaints, demands,

hearings, pleadings, adversary proceedings, proposed orders, confirmed copies of orders, any proposed disclosure statement or plan of reorganization, or request, formal or informal, whether transmitted or conveyed by mail, email, fax or otherwise that has been filed with the court, any other documents or instruments filed in the above-referenced case and any other matter in which notice is required pursuant to Title 11 of the United States Code and the Federal Rules of Bankruptcy Procedure.

FURTHER NOTICE is hereby given that this Notice of Appearance and any later appearance, pleading, claim or suit shall not be deemed to be a waiver of the rights of for Sonder USA Inc. (1) to have final orders in matters and proceedings in which a Bankruptcy Court does not have the power to enter a final order under Article III of the Constitution entered only after *de novo* review by a District Court Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any rights, actions, or defenses relating to the scope of the Bankruptcy Court's jurisdiction, or (5) to any other rights, claims, actions, defenses, setoffs, or recoupments to which for Sonder USA Inc. is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments for Sonder USA Inc. expressly reserves. Nor shall this Notice of Appearance be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: January 23, 2025

Respectfully submitted:

KEAN MILLER LLP

/s/ J. Eric Lockridge

J. Eric Lockridge

Texas State Bar No. 24013053

eric.lockridge@keanmiller.com

KEAN MILLER LLP

400 Convention Street, Suite 700

P. O. Box 3513 (70821-3513)

Baton Rouge, LA 70802

Telephone: (225) 387-0999

Attorney for Sonder USA Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed through the Court's CM/ECF system on January 23, 2025, and that all parties, including the Debtor, the U.S. Trustee, the Chapter 11 Trustee, and all creditors and parties requesting notice, were served through the Court's CM/ECF system.

/s/ J. Eric Lockridge